

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

HEATHER MARKWELL, :
Plaintiff, :
: Case No. 3:19-CV-00002
v. :
: Judge Walter H. Rice
BROOKDALE SENIOR LIVING, INC., :
Defendant. :
:

**DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT
OR COMPEL ARBITRATION AND STAY PROCEEDINGS**

Defendant Brookdale Senior Living Inc. (“Defendant,” “Brookdale,” or “the Company”), by and through counsel, respectfully requests that this Honorable Court dismiss this case in its entirety, or, in the alternative, compel arbitration and stay all proceedings pending completion of that arbitration. The grounds for this motion are fully set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Shannon K. Patton
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*Attorney for Defendant
Brookdale Senior Living Inc.*

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing *Defendant's Motion to Dismiss Plaintiff's Complaint or Compel Arbitration and Stay Proceedings and Memorandum in Support* has been filed via the electronic filing system on May 3, 2019. Notice of filing will be performed by the Court's electronic filing system, and Parties may access the document through the electronic filing system.

/s/ Shannon K. Patton
Shannon K. Patton

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